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9 *RICHARD CARSON-SELMAN*

10  
11 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

12 TRINA SOLAR US, INC.,

13 Plaintiff,

14 v.

15 RICHARD CARSON-SELMAN; JOLANDE  
16 CARSON-SELMAN; KIRBY WELLS &  
17 ASSOCS., as Trustee FBO LIME LIGHT  
18 DOMESTIC NON-GRANTOR INSURANCE  
TRUST,

19 Defendants.

Case No. 2:20-cv-01308-JCM-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE PROPOSED  
PRE-TRIAL ORDER**

21 Defendant, RICHARD CARSON-SELMAN, by and through his counsel of record M.  
22 Bradley Johnson, Esq. and Michael R. Esposito, Esq., of the law firm of Kravitz Schnitzer Johnson  
23 & Watson, Chtd., Defendant KIRBY WELLS & ASSOCS., as Trustee FBO LIME LIGHT  
24 DOMESTIC NON-GRANTOR INSURANCE TRUST (“Kirby Wells”), by and through its counsel  
25 of record Timothy R. Treffinger, Esq. of the Law Office of Timothy R. Treffinger, and Plaintiff  
26 TRINA SOLAR US, INC., by and through its counsel of record, Matthew Pruitt, Esq. of the law  
27 firm of Kirton McConkie, and hereby stipulate and agree as follows:

28 1. This Court granted Defendant Carson-Selman’s Substitution of Attorney,

1 substituting in the undersigned counsel (“KSJW”), on December 5, 2022.<sup>1</sup>

2       2. Defendant Carson-Selman’s counsel has been actively marshaling, reviewing, and  
3 evaluating client documents, pleadings and moving papers in order to properly prepare for the  
4 upcoming trial.

5       3. Unfortunately, KSJW has learned that Defendant Carson-Selman’s prior counsel,  
6 Karl Anderson, Esq. (“Anderson”) had apparently (upon information and belief) received an  
7 incomplete client file from Defendant Carson-Selman’s original counsel in this action (“Original  
8 Counsel”).

9       4. As a result, Anderson did not and/or could not provide KSJW with deposition  
10 records, a complete set of disclosures or associated disclosed records, draft pre-trial exhibit lists,  
11 and other material documentation; an unanticipated complication in preparing for trial.

12       5. As a result, KJSW is actively and expeditiously seeking out documents from (a)  
13 Plaintiff’s counsel; (b) Defendant Kirby Wells; and (c) All American Court Reporting.

14       6. On November 29, 2022, before Defendant Carson-Selman’s Substitution of Attorney  
15 was filed, Plaintiff filed a Proposed Pretrial Order.<sup>2</sup>

16       7. As a result of Plaintiff’s filing of the Proposed Pre-Trial Order, this Court issued a  
17 minute order on December 6, 2022 denying the Proposed Pretrial Order and requiring the Parties to  
18 file a joint pre-trial order within 14 days.<sup>3</sup>

19       8. The joint pre-trial order is current due on or before December 20, 2022.

20       9. KSJW requires a reasonable amount of time to obtain, review, and evaluate these  
21 documents in order to meaningfully prepare a proposed exhibits list, evaluate and provide objections  
22 to Plaintiff’s proposed exhibits, and to otherwise attempt to narrow the scope of triable issues as  
23 necessary. All of this is necessary to prepare a pre-trial order in good faith.

24       10. Accordingly, the Parties respectfully request that this Court extend the deadline to  
25 file a proposed pre-trial order by thirty (30) days from the date of the entry of this order.

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26 <sup>1</sup> ECF 94.

27 <sup>2</sup> ECF 90.

28 <sup>3</sup> ECF 95.

1           11.     This is the first stipulation between the Parties seeking a continuance of Pre-Trial  
2 Deadlines and it is not being entered into for purposes of delay.

3           12.     The purpose of this stipulation is to respectfully request time to allow a just trial on  
4 the merits consistent with Fed. R. Civ. P. 1.

5  
6 DATED this 15th day of December, 2022.

DATED this 15th day of December, 2022.

7 KRAVITZ SCHNITZER  
8 JOHNSON & WATSON, CHTD.

KIRTON MCCONKIE

9 /s/ Michael R. Esposito, Esq.

/s/ Matthew Pruitt, Esq.

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MATTHEW PRUITT, ESQ.

Nevada Bar No. 4646

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St. George, Utah 84770

13 *Attorneys for Defendant*

*Attorneys for Plaintiff*

*Richard Carson-Selman*

14 DATED this 15th day of December, 2022

15 LAW OFFICE OF

16 TIMOTHY R. TREFFINGER.

17 /s/ Timothy R. Treffinger, Esq.

18 TIMOTHY R. TREFFINGER, ESQ.

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20 *Attorneys for Defendant*

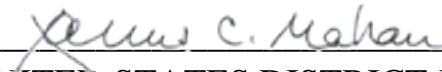
*Kirby Wells & Assocs., As Trustee FBO Lime*

21 *Light Domestic Non-Grantor Insurance*

*Trust*

**ORDER**

IT IS SO ORDERED: The Parties shall have 30 days from the date of entry of this order to file a joint proposed pre-trial order.

  
UNITED STATES DISTRICT JUDGE

DATED: December 16, 2022